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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

Marquis Wilson
Plaintiff,

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

JAN 27 2021

JULIA C. DUDLEY, CLERK
BY: A. Boeson
DEPUTY CLERK

v.

CASE No. 7:20-CV-00533-TTC
RSB

Harold W. Clarke Et Al.

Defendants

Memorandum in Support of Plaintiff
Rule 12 Motion/Not to Dismiss.

(2)

THE PETITIONER NOW ASKS THIS COURT TO
DENY THE DEFENDANTS MOTION TO DISMISS
THAT WHICH WAS FILED ON 12.15.2020
(DOCUMENT 31). THE PETITIONER HAS ATTACHED
A SWORN AFFIDAVIT IN SUPPORT OF THIS
MOTION. FOR THOSE REASONS HE PRAYS THAT
THIS MOTION BE GRANTED.

Respectfully Submitted
MR. MARQUIS ROBERT WILSON
P.O. Box 430
Dillwyn, VA.
23934

Affidavit Of Marquis Robert Wilson
Under Oath I Do Swear

#1 I Marquis Robert Wilson, Would first Remind THE COURT THAT I AM Visually Impaired, Hearing Impaired, AND HAVE BEEN DIAGNOSED WITH AND Somewhat Treated For Both Memory Loss AND SEVERE MENTAL ILLNESS.

#2 THE DEFENDANTS HAVE TRANSFERRED ME TO FIVE FACILITIES IN A SIX MONTH TIME SPAN.

#3 SINCE ARRIVING AT BUCKINGHAM Correctional Center I HAVE FILED NUMEROUS GRIEVANCES RELATED TO MY CONDITIONS OF CONFINEMENT AS A DISABLED PERSON.

#4 AFTER EXHAUSTING ADMINISTRATIVE Remedies I Subsequently Filed Complaint No: 7:20-cv-00452, Which THE DEFENDANTS ARE Attempting To Associate With AN Unrelated Civil Matter Regarding MY Condition Of Confinement In A Different Facility ie, Greenville Correctional Center.

(4)

#5 Though My Hearing Disability Is Directly Related To Being Housed At B.C.C., The Current Complaint Is Specific To The Buckingham Correctional Center.

#6 Also As A Result Of My Many Verified Disabilities I Am Unable To Properly Litigate And Process The Information Very Well. Therefore, I Am Reliant On Jailhouse Lawyers, Who Have Been Very Reluctant In Helping Me, Rightfully So For Fear Of Retaliation By Defendants.

#7 Furthermore, Due To The Pandemic Crisis, It Is Virtually Impossible To Meet With An Institutional Attorney.

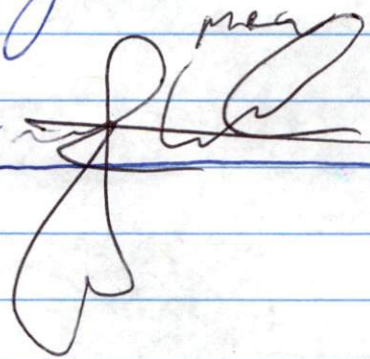
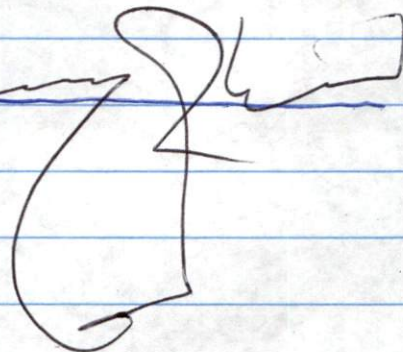
#8 Please Don't Dismiss My Complaint, I Need Help And This Court Is My Only Hope.

#9 The Only Reason That Mr. Barry Marano Is Mentioned In My Current Complaint Is Because The ADA Coordinator At B.C.C. Found Another ADA Coordinator After He Mr. Sink Retired And Mr. Barry Marano

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Stepped In To fill In Until B.K.C.C. Found
Another ADA Coordinator Due To The Fact
That He Is The Statewide ADA Coordinator.

Signed Under The Pain And Penalty Of
Perjury.

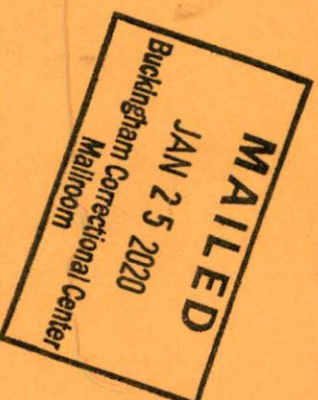
DATE  , 2021 

DATE 1-12-2021

Ruby Call 350432
County of Buckingham
State of Virginia



Walteris Wilson #1435580
Buckingham Correctional Center
P.O. Box 430
Dillwyn, VA.
* 23936 *



United States District Court
Office of The Clerk
210 Franklin Rd., Rm 54
Roanoke, VA.
* 24011 *

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